

FILED

SEP 23 2020

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS OFFICE

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL M. RAPA,

Defendant.

CRIMINAL NO.

20-30141-SMY

Title 18, United States Code,
Sections 2252A(a)(5)(B)
and 2253

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

POSSESSION OF PREPUBESCENT CHILD PORNOGRAPHY

On or about November 2, 2017, in St. Clair County, within the Southern District of Illinois,

MICHAEL M. RAPA,

defendant herein, did knowingly possess an Apple MacBook Pro laptop computer, Model A1502, bearing serial number C02ML0BNFH01; and an Apple iMac All-in-One computer, Model A1311, bearing serial number C02HM18GDHJN, that contained prepubescent child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that has been mailed, or shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means, including by computer, and that was produced using materials that have been mailed, or shipped or transported in or affecting interstate or foreign commerce by any means, including by computer; all in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

COUNT 2

POSSESSION OF PREPUBESCENT CHILD PORNOGRAPHY

On or about November 30, 2017, in St. Clair County, within the Southern District of Illinois,

MICHAEL M. RAPA,

defendant herein, did knowingly possess an Apple Time Capsule Hard Drive, Model A1470, bearing serial number C86M44XLF9H5, that contained prepubescent child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that has been mailed, or shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means, including by computer, and that was produced using materials that have been mailed, or shipped or transported in or affecting interstate or foreign commerce by any means, including by computer; all in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

COUNT 3

POSSESSION OF CHILD PORNOGRAPHY

On or about December 12, 2017, in St. Clair County, within the Southern District of Illinois,

MICHAEL M. RAPA,

defendant herein, did knowingly possess a Microsoft Surface Pro 3, Model 1631, bearing serial number 003518451053, that contained child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that has been mailed, or shipped or transported using any means or

facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means, including by computer, and that was produced using materials that have been mailed, or shipped or transported in or affecting interstate or foreign commerce by any means, including by computer; all in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

FORFEITURE ALLEGATION

Upon conviction for the offenses charged in this Indictment, defendant **MICHAEL M. RAPA**, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, any and all material that contained any images of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), and any and all property used and intended to be used in any manner or part to commit and to promote the commission of the charged offenses.

The property that is subject to forfeiture referred to in the paragraph above includes, but is not limited to, the following:

1. an Apple MacBook Pro laptop computer, Model A1502, bearing serial number C02ML0BNFH01;
2. an Apple iMac All-in-One computer, Model A1311, bearing serial number C02HM18GDHJN;
3. an Apple Time Capsule Hard Drive, Model A1470, bearing serial number C86M44XLF9H5; and
4. a Microsoft Surface Pro 3, Model 1631, bearing serial number 003518451053.

A TRUE BILL



Angela Scott
ANGELA SCOTT
Assistant United States Attorney

Norman R. Smith
STEVEN D. WEINHOFER
United States Attorney

Recommended Bond: \$10,000 unsecured bond.